


LDH Compliance Review & Investigations Policy

	Louisiana Department of Health (LDH)	
	Policy Number	130.1
	Content	Compliance Review & Investigations
	Effective Date	March 2, 2020
	Inquiries to	Office of the Secretary Compliance Officer P.O. Box 629 Baton Rouge, LA 70821-0629 (225) 219-3454 FAX (225) 342-2065

If there is a discrepancy between an LDH Policy and a Program Office or facility policy, the LDH policy shall govern/override/supersede the conflicting section within the Program Office or facility policy.

I. POLICY STATEMENT

The purpose of this policy is to establish procedures for the evaluation of complaints and referral of those complaints for review or investigation.

II. APPLICABILITY

This policy applies to all Louisiana Department of Health Employees and Contractors.

III. POLICY PROVISIONS

Upon receipt of a report of a reportable incident as defined in the Complaint Reporting Policy, the Compliance Officer in the Office of the Secretary or his/her designee shall gather all relevant information from the individual. All reportable incidents will be entered into the Disclosure Log within 2 business days.

The Compliance Officer in the Office of the Secretary or his/her designee will review each report and make good faith inquiries to make a determination of whether the incident will be investigated

- Internally by the Compliance Investigator/Internal Audit/Program Integrity
- Referred to another section of LDH for review/investigation (Legal, Human Resources, OAAS, OCDD, OPH, etc.)
- Referred to an outside agency for review/investigation (Louisiana State Office of Inspector General, Attorney General, local law enforcement, etc.), or
- Declined for review due to one of the following reasons:
 - 1.) Insufficient information – the complaint lacks sufficient detail to support review/investigation.
 - 2.) Minimal impact – the allegation indicates nominal financial impact or risk to the Department.
 - 3.) Non-violation – the alleged acts are not a violation of laws, statutes, regulations, etc.
 - 4.) Other – reason for no review or referral will be documented in the Disclosure Log

When LDH receives a report that is sufficiently specific so that it reasonably (1) Permits a determination of the appropriateness of the alleged improper practice, and (2) provides an opportunity for taking corrective action, LDH shall conduct an internal review of the allegations set forth in the disclosure and ensure that proper follow-up is conducted.

The Disclosure Log shall include a summary of each disclosure received (whether anonymous or not), the status of the respective internal reviews, and any corrective action taken in response to the internal reviews.

Reporters may request to remain anonymous by informing the individual they are reporting to that they wish to remain anonymous or by using the LDHreportfraud@la.gov email address and indicating their wish to remain anonymous in that email. Any individuals who are involved in the review and investigation processes will make all reasonable efforts to maintain the anonymity and confidentiality of reporting individuals.

LDH maintains an affirmative duty to protect its employees from harassment, reprisal, or retaliation. This protection extends to any employee making a good faith complaint of a reportable incident, as well as those employees providing information or participating in the investigative process. Employees can be assured that if a complaint is made and an investigation reveals that harassment, retaliation or reprisal has occurred, disciplinary action shall be imposed on the offender, up to and including dismissal.

IV. RESPONSIBILITIES

The Compliance Officer or his/her designee is responsible for gathering relevant information from complainants, entering complaints into Disclosure Log, screening complaints and determining appropriate disposition, and updating the disclosure log with the results of any investigations and any corrective actions if applicable.

All LDH employees and contractors are responsible for cooperating in any investigation.

V. DISCIPLINARY ACTIONS

Any employee who violates this policy may be subject to disciplinary action up to and including dismissal from employment.

VI. REVISION HISTORY

Date	Revision
March 2, 2020	Policy created